

1 J. Erik Heath, Esq. (SBN 304683)
J. ERIK HEATH, ATTORNEY AT LAW
2 369 Pine St., Ste. 410
San Francisco, CA 94104
3 Tel.: (415) 426-7850
Fax: (415) 449-6556
4 erik@heathlegal.com

5
6 Attorney for Plaintiff
OSKAR LIZARRAGA-DAVIS

7
8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

10
11 OSKAR LIZARRAGA-DAVIS,

12 *Plaintiff,*

13 v.

14
15 TRANSWORLD SYSTEMS, INC.,

16 *Defendant.*

Case No. 5:18-cv-4081-BLF

**JOINT STIPULATION TO SET
DISCOVERY DEADLINES;
[PROPOSED] ORDER**

17
18 Plaintiff Oskar Lizarraga-Davis and Defendant Transworld Systems, Inc. ("TSI") hereby
19 stipulate and agree as follows:

20 WHEREAS, a Case Management Conference (CMC) was held in this case on December
21 13, 2018;

22 WHEREAS, the Court requested the parties to meet and confer to stipulate to all
23 remaining deadlines not set in the CMC Order, including discovery cut-offs and expert
24 disclosure deadlines;

25 //

26 //

27 //

WHEREAS, the parties have agreed to the below schedule:

Event	Date
Non-expert discovery cut-off	4/30/2021
Disclosure of experts	5/31/2021
Rebuttal experts	6/21/2021
Expert discovery cut-off	7/15/2021

IT IS HEREBY STIPULATED AND AGREED that the Court adopt the above discovery schedule and deadlines.

Dated: January 16, 2019

J. ERIK HEATH, ATTORNEY AT LAW

/s/ Jon Erik Heath

J. Erik Heath
Attorney for Plaintiff
OSKAR LIZARRAGA-DAVIS

Dated: January 23, 2019

SESSIONS, FISHMAN, NATHAN & ISRAEL, LLP

/s/ Damian P. Richard

Damian P. Richard
Attorney for Defendant
TRANSWORLD SYSTEMS, INC.

L.R. 5-1 Attestation

Pursuant to L.R. 5-1(i)(3) regarding signatures, I, J. Erik Heath, attest that concurrence in the filing of this document has been obtained from each of the other signatories. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 23rd day of January, 2019, at San Francisco, California.

By: /s/ Jon Erik Heath

J. Erik Heath

ORDER

Having read the foregoing stipulation and agreement of the parties, and for good cause appearing, IT IS SO ORDERED THAT,

- 1) The cut-off for non-expert is April 30, 2021;
- 2) The deadline for disclosure of experts is May 31, 2021;
- 3) The deadline to disclose rebuttal experts is June 21, 2021; and
- 4) The cut-off for expert discovery is July 15, 2021.

Dated: _____

Hon. Beth Labson Freeman
U.S. DISTRICT JUDGE